

**G A R I B I A N**  
— LAW OFFICES —

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June 27, 2022

**BY ECF**

The Honorable Sarah Netburn  
United States Magistrate Judge  
U.S. District Court for the Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: Corporate Universe, Inc. v. Michael Dobbs, et al.**  
**USDC SDNY, C.A. No. 21-CV-06923**

Dear Judge Netburn,

Counsel to the parties in the above-referenced matter, Plaintiff Corporate Universe, Inc. (“COUV”) and Defendant Michael Dobbs (“Dobbs”), jointly file this letter in compliance with the Court’s June 23, 2022 (“Order”). Pursuant to the Order, the parties were ordered to meet and confer as to whether they consent to a) moot the pending motion to dismiss and proceed with summary judgment briefing, or b) extend the deadline to file any motion for summary judgment until 30 days after the Court addresses the motion to dismiss, if necessary. Counsel is pleased to report that as of this correspondence, all paper discovery and depositions have been completed, with the last fact deposition of a third-party witness having been completed on June 17, 2022.

Both Plaintiff and Dobbs consent to option (a) in the Court’s Order, which is to moot the pending motion to dismiss and proceed with summary judgment briefing. However, for logistical reasons related to the availability of the deposition transcripts, as explained below, the parties respectfully request a sixty (60) day extension of this deadline.

The depositions in this matter were conducted on June 15, 16 and 17, 2022. The June 17, 2022 deposition was conducted of a non-party witness appearing pursuant to subpoena. During his deposition, the witness, Miro Zecevic, requested an opportunity to review the transcript. Pursuant to the Fed R. Civ. P. 30(e), Mr. Zecevic has thirty (30) days to review the transcript and to potentially make changes. Both parties intend to rely on Mr. Zecevic’s deposition transcript in their motions for summary judgment. However, due to the 30-day time period for the witness’ review of the transcript, the transcript will not be ready by the July 15, 2022 deadline. Accordingly, the parties respectfully request a sixty (60) day extension to allow for the finalization of the transcript prior to preparation and filing of the parties’ respective summary judgment motions.

Counsel appreciates the Court's consideration of the foregoing and if there are any questions or concerns, undersigned counsel are available at the convenience of the Court.

**GARIBIAN LAW OFFICES, P.C.**

/s/ Antranig Garibian

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*Attorneys for Plaintiff, Corporate Universe, Inc.*

**THE SHELL LAW FIRM, PLLC**

/s/ Martin Shell

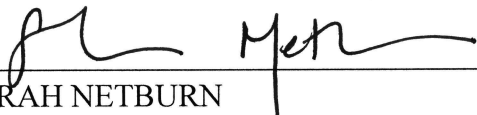
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*Attorneys for Defendant, Michael Dobbs*

Defendant's Motion to Dismiss is DENIED as moot. The Clerk of Court is respectfully directed to close the gavel at ECF No. 50. The parties' request for a 60-day extension of the deadline to file their motions for summary judgment is GRANTED. The parties shall file their motions for summary judgment by no later than September 13, 2022. Any opposition shall be filed by September 27, 2022. Any reply shall be filed by October 4, 2022.

**SO ORDERED.**

  
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SARAH NETBURN  
United States Magistrate Judge

Dated: June 29, 2022  
New York, New York